

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JACK REESE, JAMES
CICHANOFSKY, ROGER MILLER,
and GEORGE NOWLIN on
behalf of themselves and
a similarly situated class,
Plaintiffs,
v.

Hon. Patrick J. Duggan
Case No. 04-70592
Class Action

CNH INDUSTRIAL N.V. and
CNH INDUSTRIAL AMERICA LLC,

Defendants.

EXHIBIT I

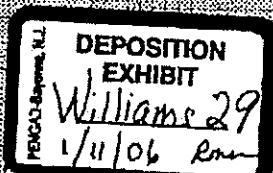
To

PLAINTIFFS' RESPONSE
TO CNH'S MOTION FOR SUMMARY JUDGMENT

Excerpts From 1998 Case/UAW Group Benefit Plans

Re: Maternity and Union Leaves of Absence

CASE / UAW
GROUP BENEFIT PLANS
1998 NEGOTIATIONS



CNHA032476

Case Corporation
Group Insurance Plan
Effective 1998

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E. Maternity Leave of Absence

Employees placed on Leave of Absence for maternity will be permitted to continue Life, Medical, Dental, Prescription Drug, Vision and Hearing coverages at normal active employee rates, if required for up to twelve (12) months following the date the Leave of Absence commenced. The coverage shall include eligible dependents.

F. Contested Worker's Compensation Claim

In the event of a contested claim for Worker's Compensation Benefits, the following procedure will be followed:

- 1) With regard to medical services, the Company physicians, at their discretion, may either treat the employee, refer him to an outside physician, or permit him to go to a physician of his choice (subject to applicable State law).
- 2) The employee shall receive an amount of money equal to his current Weekly Indemnity rate, but this benefit will not be considered either Weekly Indemnity or Worker's Compensation until such time as the dispute is finally resolved.
- 3) The employee will be required to sign a reimbursement form which will provide that any Worker's Compensation judgment in favor of the employee which duplicates a payment previously made by the Company, will be returned to the Company by the employee, or deducted from any final settlement the Company may be required to make.

The above action taken while the dispute is pending will in no way impair the rights of the employee or the Company nor be used to prejudice the position of either.

Case Corporation
Group Insurance Plan
Effective 1998

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G. Leave of Absence

1) **Union Business**

Medical, Dental, Prescription Drug, Vision and Hearing coverage will be continued at Company expense consistent with that applicable to active employees, during an approved leave of absence requested by the Local Union to permit an employee to work on a full-time basis for the Local Union for a period not longer than the balance of the month in which the leave commenced plus the following full calendar month. Thereafter, the employee shall be entitled to continue such coverage by paying the full cost thereof.

2) **Personal**

The group coverage (life insurance, accidental death & dismemberment, survivor income benefit insurance, medical, dental, prescription drug, vision and hearing) shall be continued in force for the month following the month in which the Leave commences.

H. Special Age 65 Benefit (Medicare Payment)

1) The Special Age 65 Benefit (Medicare payment) shall be payable to active employees age 65 or older and on behalf of the employee's spouse if covered by Medicare Part B. The Medicare payment shall be payable to disabled employees who are eligible for Medicare Part B during the period they are receiving Long Term Disability Benefits and monthly installment Life Insurance Benefits.

The Medicare Payment shall be increased on the date(s) indicated:

April 1998	\$59.40 or actual amount if less
January 1, 2001	\$62.00 or actual amount if less
January 1, 2002	\$65.50 or actual amount if less

2) In addition, the Medicare Payment is payable on behalf of:

- a) Employees who retired on a company-provided pension after 7/1/94;
- b) The eligible spouse of retired employees who retired after 7/1/94; or
- c) Surviving spouses of employees who retired after 7/1/94, receiving a spouse's pension or who will receive a spouse's pension upon exhausting Transition and Bridge benefit payments.

3) If the company provided coverage is primary for active employees and their eligible dependents or disabled employees and their eligible dependents, the company will not reimburse the employee (active or disabled) or eligible dependents the Medicare Part B premium.

The retired employee, spouse, or surviving spouse must be enrolled for Medicare Part B. The benefit is not payable, however, if a Medicare repayment is being paid on behalf of the retired employee or spouse from another source.